

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

FRANCIS RYAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
FLEXI-BOGDAHN INTERNATIONAL,	)	CASE NO.:
GMBH & CO KG, a German corporation,	)	
FLEXI USA, INC., a Wisconsin	)	
corporation and WAL-MART STORES,	)	
INC., an Arkansas corporation,	)	
	)	
Defendants.	)	

**DEFENDANTS, FLEXI USA, INC. AND WAL-MART STORES, INC.'S  
MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF'S  
COMPLAINT AT LAW**

Defendants, Flexi USA, Inc., ("Flexi USA"), a Wisconsin Corporation, and Wal-Mart Stores, Inc. ("Wal-Mart"), a Delaware corporation, by and through their attorneys, LITCHFIELD CAVO LLP, and for their Motion for Enlargement of Time to Respond to Plaintiff's Complaint at Law, state as follows:

1. Flexi USA and Wal-Mart seek an extension up to and including August 8, 2008 to file their Answers and Affirmative Defenses or otherwise plead to Plaintiff's Complaint at Law.
2. Plaintiff, Francis Ryan, filed a Complaint at Law sounding in negligence, strict Liability and breach of warranties.
3. Flex USA and Wal-Mart requires sufficient time to investigate and properly respond to the allegations contained in the Plaintiff's Complaint at Law.

WHEREFORE, Defendants, Flexi USA, Inc. and Wal-Mart Stores, Inc., requests this Honorable Court for an enlargement of time up to and including August 8, 2008 to file their Answers and Affirmative Defenses or otherwise plead to the Plaintiff's Complaint at Law, and for any and all other relief this Court deems just and appropriate.

Dated July 10, 2008

Respectfully Submitted,

FLEXI USA, INC. AND WAL-  
MART STORES, INC.

By: /s/ Nicholas J. Parolisi, Jr.  
One of Their Attorneys

Nicholas J. Parolisi, Jr. (ARDC No. 6201759)  
Ohn Park (ARDC No. 6237839)  
LITCHFIELD CAVO LLP  
303 West Madison Street, Suite 300  
Chicago, Illinois 60606  
(312) 781-6665  
(312) 781-6630 – fax  
email: [parolisi@litchfieldcavo.com](mailto:parolisi@litchfieldcavo.com)  
[park@litchfieldcavo.com](mailto:park@litchfieldcavo.com)

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2008, I electronically filed the foregoing Defendants, Flexi USA, Inc.' and Wal-Mart Stores, Inc.'s Motion for Enlargement of Time to Respond to Plaintiff's Complaint at Law with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

None.

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participant:

Blake K. Consentino  
213 S. 2nd Street  
Dekalb, Illinois 60115  
*Counsel for Plaintiff*

Dated: July 10, 2008

By: /s/Nicholas J. Parolisi, Jr.

Nicholas J. Parolisi, Jr. (ARDC No. 6201759)  
Ohn Park (ARDC No. 6237839)  
LITCHFIELD CAVO LLP  
303 W. Madison, Suite 300  
Chicago, Illinois 60606  
312/781-6665 (Parolisi)  
312/781-6684 (Park)  
312/781-6630 (fax)  
email: [parolisi@litchfieldcavo.com](mailto:parolisi@litchfieldcavo.com)  
[park@litchfieldcavo.com](mailto:park@litchfieldcavo.com)